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December 2, 2005

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-A235
Washington, DC 20554

RE: Telecommunications Relay Services and Speech-to-Speech Services for
Individuals with Hearing and Speech Disabilities
CG Docket No. 03-123

Dear Ms. Dortch:

On October 18, 2004, the Interstate Telecommunications Relay Services (TRS) Fund Advisory Council (the Council) submitted comments in response to the Further Notice of Proposed Rulemaking on TRS, released June 30, 2004.¹

In the FNPRM, the FCC requested comments on a number of outstanding issues related to Video Relay Service (VRS) and Internet Protocol Relay (IP), and on the abuse of Communications Assistants (CA). The Commission also recognized the need to reevaluate the mission of the Interstate TRS Fund Advisory Council (Council) and sought comments on its composition, the nomination procedure, how the Council could have a more productive role in connection with monitoring cost recovery issues, if the Council was still necessary, or whether the Council's role should be expanded to include advising the fund administrator and the Commission on other TRS issues.

The Council's original comments were limited to the questions raised in the FNPRM on its role and structure. Although the deadline to submit comments on the FNPRM has passed, the Council has learned that the Commission is considering imposing limits on Council meetings, specifically by restricting future Council meetings to the Washington, DC area. The Council would therefore like to supplement its October 2004 comments by explaining the benefits of having one of its semi-annual meetings in a location other than Washington, DC.

In the Third Report and Order on TRS, the FCC directed NECA to establish an advisory committee that would meet at reasonable intervals (semi-annually) in order to monitor TRS cost

¹ See Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities, CC Docket No. 90-571, CC Docket No. 98-67 and CG Docket No. 03-123, *Report and Order*, *Order on Reconsideration*, and *Further Notice of Proposed Rulemaking*, 19 FCC Rcd 12475 (2004) (FNPRM).

recovery matters.² Council members represent various constituencies including members of the hearing and speech disability communities, state regulators and relay administrators, TRS users, interstate service providers and TRS providers. Over the years, members have come from all parts of the country - from New York to California and from Puerto Rico to Montana. Since 1994, the Council has generally met twice a year, usually in the Spring and Fall. The Spring meeting has been held in Washington, DC allowing members of the Washington, DC regulatory community to participate in at least one Council meeting per year. In the Fall, the Council has opted to meet at various locations around the country to give interested parties living in other areas of the country the opportunity to attend.

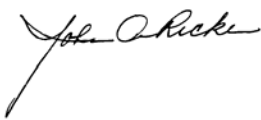
Representatives from various national and state Deaf and hard of hearing organizations, from state agencies associated with relay services, and from the relay provider community have attended meetings held outside Washington, DC. For the past three years, Fall Council meetings have been held in conjunction with annual meetings of other organizations who are particularly interested in the funding of TRS – with the National Association of State Relay Administrators (NASRA) in 2003 and 2004, and the National Association of Regulatory Utility Commissioners (NARUC) in 2005. NASRA members attended 2003 and 2004 Council meetings en masse to learn the status of Internet (IP) and Video (VRS) funding. At the recent NARUC meeting, a session on new relay technology, equipment distribution programs, and the impact of FCC jurisdictional rulings on IP Relay service was “standing room only”.

The Council strongly believes that members of NASRA and NARUC, as well as relay consumers and providers, have benefited from having TRS Advisory Council meetings held in close proximity to these organizations’ meetings and that these benefits substantially outweigh possible negative perceptions of such meetings. Further, because Council members come from all around the country, there would be no apparent cost savings associated with restricting Council meetings to the Washington, DC area – the same level of travel and meeting expenses are likely to be incurred regardless of whether the Fall meeting is held in Washington, DC or another location.

The Council accordingly requests the Commission continue to allow the Council to exercise its discretion in selecting a meeting location other than Washington, DC for at least one meeting a year so that it may continue to interact with interested parties on a first-hand basis.

In accordance with the Commission’s rules, this *Letter* has been filed electronically in the above referenced docket.

Yours truly,

A handwritten signature in black ink, appearing to read "John Q. Ricks", is written over a thin red horizontal line.

for Warren Barnett

Chair, Interstate TRS Fund Advisory Council

Cc: T. Chandler, DRO

² See Telecommunications Relay Services, and the Americans with Disabilities Act of 1990, CC Docket No. 90-571, *Third Report and Order*, 8 FCC Rcd 5300 (1993) at ¶ 8 (TRS III).